

**CERCLA 104(e) INFORMATION REQUEST**  
**URGENT LEGAL MATTER: PROMPT REPLY REQUESTED**  
**VIA CERTIFIED MAIL #9590 9401 0007 5205 8744 72**

Allied Towing Service, LLC  
Francis J. Lobrano  
Registered Agent for Allied Towing Service LLC  
147 Keating Dr.  
Belle Chasse, Louisiana 70037

Re: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana;  
CERCLIS #: LAD008434185; Information Request Pursuant to  
CERCLA Section 104(e), 42 U.S.C. §9604(e), Information Request

Dear Sir or Madam:

The is a follow up to the information request letter the U.S. Environmental Protection Agency (EPA) issued to Allied Towing Service, LLC (hereinafter Allied Towing Service, LLC is referred to as “Allied Towing,” “you” or “your”) on May 15, 2015. The May 15, 2015, letter indicated that the EPA is involved in an ongoing investigation of the releases and/or threatened releases of hazardous substances, pollutants, or contaminants at the SBA Shipyard Superfund Site (Site) located in Jennings, Jefferson Davis Parish, Louisiana. This letter seeks your cooperation in providing information and documents relating to the contamination of the Site. A Superfund site is a site contaminated with high levels of hazardous substances that may present a threat to human health and the environment.

The EPA is seeking to obtain additional information concerning whether you have or had a corporate relationship with Transerve Marine as well as the generation, storage, treatment, transportation, and disposal methods of hazardous substances, pollutants, or contaminants that have been or threaten to be released from the Site.

**This information request is not a determination that you are responsible or potentially responsible for contamination that occurred at the Site.** The EPA is sending you this letter as part of its investigation of the circumstances related to the Site and does not expect you to pay for or perform any site-related activities at this time. Should EPA determine that you are responsible or potentially responsible for response activity at the Site, you will receive a separate letter clearly stating such a determination as well as the basis EPA has for making such a determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section

104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require you to respond to this information request (see Enclosure 1). We encourage you to give this matter its full attention, and ***we respectfully request that you respond to this request for information within thirty (30) days of its receipt of this letter.*** You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$37,500.00 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Kenneth Talton, Enforcement Officer, at the address included in the Information Request. Please refer to the enclosures below, which include important instructions and definitions, as well as the questions for response, in the preparation of your reply to this Information Request.

If you have any questions regarding this letter, contact Mr. Kenneth Talton at (214) 665-7475. For legal questions concerning this letter, please have your legal counsel contact Ms. I-Jung Chiang, at (214) 665-2160. Thank you for your attention to this matter.

Sincerely yours,

Ben Banipal, P.E., Associate Director  
Technical and Enforcement Branch  
Superfund Division

Allied Towing Service, LLC  
12608 Highway 23  
Belle Chasse, Louisiana 70037

Enclosures (4)